

Pretrial Motion No. 4: Motion to dismiss Counts 12-13 pursuant to Fed. R. Crim P. 12(b)(3)(B)(v) for failure to state an offense, and to dismiss Count 13 pursuant to Fed R. Crim. P. 12(b)(3)(A)(i) for improper venue or in the alternative, to sever Counts 12-13 pursuant to Fed. R. Crim. P. 12(b)(3)(B)(iv) & 12(b)(3)(D);

Pretrial Motion No. 5: Motion to compel additional discovery from FTX pursuant to Fed. R. Crim. P. 16, *Brady v. Maryland*, 373 U.S. 83 (1963), *Giglio v. United States*, 405 U.S. 150 (1972), and the Jencks Act on the basis that FTX is a member of the “prosecution team”;

Pretrial Motion No. 6: Motion for a bill of particulars pursuant to Fed. R. Crim P. 7(f) and pretrial disclosures; and

Pretrial Motion No. 7: Motion to dismiss multiplicitous counts pursuant to the Fifth Amendment and Fed. R. Crim P. 12(b)(3)(B)(ii).

Dated: May 8, 2023
New York, New York

Respectfully submitted,

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